

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

**TOUCHPOINT PROJECTIONS
INNOVATIONS, LLC,**

Plaintiff,

v.

CLOUDFARE, INC.,

Defendant.

**CASE NO. 2:24-cv-00343-JRG
(Lead Case)**

**TOUCHPOINT PROJECTIONS
INNOVATIONS, LLC,**

Plaintiff,

v.

IMPERVA, INC.,

Defendant.

**CASE NO. 2:24-cv-00345-JRG
(Member Case)**

UNOPPOSED MOTION TO REINSTATE STAY OF ALL PENDING DEADLINES

On August 30, 2024, Plaintiff Touchpoint Projection Innovations, LLC filed a Motion for a 21-Day Stay of all Pending Deadlines and a Notice of Settlement (Dkt. No. 15), notifying the Court that Plaintiff and Defendant Imperva, Inc. have reached a settlement in principle. The Court granted the Motion and stayed all deadlines for 21 days up to and including September 20, 2024 (Dkt. No. 16).

The Parties have settled in principle all matters in controversy between the Parties. However, the Parties require additional time to finalize the settlement agreement, including having representatives of the Parties execute the settlement agreement, some of whom are located out of the country. Thus, the Parties respectfully request that a stay of all pending deadlines be reinstated for twenty-eight (28) days, up to and including November 14, 2024. The requested stay is not for delay, but to allow for continued efforts toward an orderly resolution of this lawsuit. Plaintiff has conferred with counsel for Defendant Imperva, Inc. and Defendant does not oppose the present motion.

Dated: October 17, 2024

Respectfully submitted,

/s/ Randall Garteiser

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I HEREBY CERTIFY on this, I caused to be electronically-filed the foregoing document with the Clerk of Court using the Court's CM/ECF system. As such, this document was served on all counsel who are deemed to have consented to electronic service.

/s/ Randall Garteiser
Randall Garteiser

CERTIFICATE OF GOOD FAITH CONFERENCE

Pursuant to Eastern District of Texas Local Rule CV-7(i), counsel has complied with the meet and confer requirement in Local Rule CV-7(h). The Parties are in agreement with this unopposed stay.

/s/ Randall Garteiser
Randall Garteiser